

**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re  
Michael W Rogers and Fallon J Rogers

Case No 5:19-bk-04684 RNO

Community Bank, National Association  
Movant  
v

Michael W Rogers and Fallon J Rogers  
Charles DeHart III  
Respondents

**ANSWER OF DEBTORS TO STAY RELIEF MOTION OF LIENHOLDER**

Michael W Rogers and Fallon J Rogers (collectively, the “Debtor”), by the Debtor’s attorney,  
Robert Spielman, state the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted. In further answer, the Debtor will cure the deficiency within a reasonable period of time.
10. Denied. The Debtor states that they believe they are current in the payments, or, in the alternative, if not, the Debtor will cure the deficiency within a reasonable period of time.
11. Despite reasonable investigation, the Debtor is without sufficient knowledge or information to be able to compute the amount due under the Note, and the allegation is therefore denied.
12. Denied. There will be repossession costs and expenses only if it is determined that Movant has sufficient legal and factual grounds for stay modification, and the Debtor denies that such grounds exist.

13. Admitted.
14. No answer required. The NADA value of the vehicle is irrelevant, since the NADA value does not reflect the actual mileage or condition of the subject vehicle, which Movant has never seen or inspected.
15. Admitted.
16. Admitted.
17. Admitted.
18. The allegation is irrelevant. The belief of Community Bank is immaterial.
19. Admitted.
20. Denied. The Debtor believes that the payments are current.
21. Denied.
22. The Debtor states that they believe they are current in the payments, or, in the alternative, if not, the Debtor will cure the deficiency within a reasonable period of time.

**WHEREFORE**, the Debtor requests that the Motion be dismissed; and that the Court grant such other relief as is just.

**LAW OFFICES OF ROBERT SPIELMAN, P.C.**

**BY: /s/ Robert Spielman**

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Robert Spielman  
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Bloomsburg, Pennsylvania  
Dated: April 1, 2020

**CERTIFICATION OF SERVICE**

I, Robert Spielman, 29 East Main Street, Bloomsburg, PA 17815-1485 certify: that I am, and at all times hereinafter mentioned was, more than 18 years of age; that on the date set forth below, I served a copy of the annexed Answer on:

Charles J DeHart III  
8125 Adams Dr  
Hummelstown PA 17036

Robert P. Sheils, III, Esquire  
Supreme Court ID: 91108  
108 North Abington Road  
Clarks Summit, PA 18411

by first class mail, postage prepaid, addressed as set forth above, or by electronic transmission. I certify under penalty of perjury that the foregoing is true and correct.

**LAW OFFICES OF ROBERT SPIELMAN, P.C.**

**BY: /s/ Robert Spielman** \_\_\_\_\_

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